

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|----------------------------------|---|----------------------------|
| DOUGLAS EL | : | CIVIL ACTION |
| | : | |
| Plaintiff, | : | |
| v. | : | NO. 02-CV-3591 |
| | : | |
| SOUTHEASTERN PENNSYLVANIA | : | |
| TRANSPORTATION AUTHORITY | : | |
| | : | JURY TRIAL DEMANDED |
| Defendant. | : | |

DEFENDANT, SEPTA'S AMENDED MOTION FOR SUMMARY JUDGMENT

Defendant, Southeastern Pennsylvania Transportation Authority (hereafter "SEPTA") moves this Court for an Order granting it summary judgment in its favor and against Plaintiff and dismissing Plaintiff's Amended Complaint for the reasons more fully set forth in SEPTA's Memorandum of Law in Support of its Amended Motion for Summary Judgment against Plaintiff.

Respectfully submitted,

SAUL H. KRENZEL, ESQUIRE
ROBERT J. HAURIN, ESQUIRE
Saul H. Krenzel & Associates
42 South 15th Street, Suite 800
Philadelphia, PA 19102
215-977-7230

Dated: October 8, 2004